

Comments on Draft Addendum 1, Disposition of Railcars, to DOE/RL-2008-07

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The appropriate set of alternatives was considered for this project, and I agree that D4 of the railway cars stored on the 212-R rail spur is the proper action. However, despite the extensive amount of material presented, several key items seem to be missing from this document, as discussed below.

It would seem appropriate to have examined several possible approaches for disposition of these railcars, rather than only assuming macroencapsulation at ERDF. It might be possible to decontaminate the cars sufficiently to permit recycle of much of the structural materials, with the nonreleasable material packaged for ERDF disposal. Because the lead shielding material is contained within a steel shell, the lead might be recyclable, avoiding placing all that lead in ERDF. If these approaches were considered and rejected for cause in the analyses for this document, that information should be included. If they were not considered and evaluated, probably they should be.

There was no information provided on the characterization of the contamination on the railcars. It would seem difficult to select appropriate paths forward without knowledge of the contaminants present, their source strength, and the ease or difficulty of removal from the railcar surfaces.

Without a detailed analysis of the planned D4 actions, it would seem difficult to develop a reasonable cost estimate for the project. No detailed discussion of proposed D4 actions is presented in the document. As a result, the cost estimated presented in Tables 5.1 and 5.3 appear to be unsupported by any analyses.

I am aware that you are required to provide cost estimates in terms of present-worth analyses, per OMB guidance. However, present-worth estimates are inappropriate for comparing the costs of projects when those project costs are incurred over significantly different time spans. DOE has no system for putting money for future expenses in a bank account where it can draw interest over the delay period.

In my view, it would be more interesting to display one of the cask cars at B-Reactor instead of a locomotive. A cask car would be much more historically unique to the Manhattan Project than a locomotive.